

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
DELIO BATISITA, CARLOS LOPEZ, MARIANA LOPEZ, and RAFAELA VALIENTE, <p style="text-align: center;">Plaintiffs,</p> VS. AVANT ASSURANCE, INC., REINIER CORTES and ANDREA GONZALEZ QUINTERO, <p style="text-align: center;">Defendants.</p>				DEFENDANT'S TRIAL EXHIBIT LIST CASE NO.: 1:22-CV-22671-ALTONAGA	
PRESIDING JUDGE HONORABLE CECILIA M. ALTONAGA		PLAINTIFF'S ATTORNEY FAIRLAW FIRM Toussaint Cummings, Esq. Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S ATTORNEY CUETO LAW GROUP P.L. Santiago Cueto Esq. Daniel Tropp, Esq. 4000 Ponce de Leon Blvd., Suite 470 Coral Gables, FL 33146	
TRIAL DATE(S)		COURT REPORTER		COURTROOM DEPUTY	
PLTF. NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1					Photographs of Avant Documents (Plaintiffs Bates 000001-17)
2					Avant Assurance Independent Contractor (IC) Standards Guide (Plaintiffs 000018-23)
3					Mariana Lopez Resignation Letter (Plaintiffs 000024)
4					Emails (Plaintiffs 000025-34, 000042-68, 000129-138, DOC 000010-15, Defendants Mariana and Carlos Lopez 00002)
5					Independent Contractor Non-Disclosure Agreement (000036)
6					Avant Client Consent Statement
7					Work Schedules Created by Alix Ledesma
8					Avant 2022 Compensation and Bonus Plans (Avant 000022-23)
9					Delio Batista State Licenses and Certifications (Plaintiffs 000071-78)
10					Delio Batista Text messages (000081-000112)
11					Plaintiff Carlos Lopez Text Messages (Bates 000113-000127).
12					Spreadsheet of Payments to Plaintiffs (provided by Defendants).
13					All Monthly Commission Statement Spreadsheets sent from Defendants to Plaintiffs
14					All Monthly Commission Statement Emails sent from Defendants to Plaintiffs

15				Defendants' Responses to Plaintiffs' First Request for Admissions
16				Defendants' Responses to Plaintiffs First Request for Interrogatories
17				All of Defendant's responses and documents produced in their request for production
18			A, R, H, UP, NP, I	DOL OPINION LETTER from Dept of Labor FLSA 2009-28
19			A, R, H, UP, NP, I	DOL OPINION LETTER from Dept of Labor FLSA WHD-2022-0003

A – Authenticity
H – Hearsay
I – Inadmissible

NP – Not produced/disclosed before discovery cut-off
R – Relevancy
UP – Unduly Prejudicial

Respectfully submitted,
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